

UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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No. 16-1358  
(15-01915-5-SWH)

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MARJORIE K. LYNCH, Bankruptcy Administrator for the Eastern District of  
North Carolina,  
Appellant,

v.

GABRIEL LEVAR JACKSON; MONTE NICOLE JACKSON,  
Debtors - Appellees,

and

A. SCOTT MCKELLAR,  
Trustee.

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CONSENT MOTION FOR EXTENSION OF BRIEFING DEADLINES

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NOW COMES Appellant, the Bankruptcy Administrator for the Eastern  
District of North Carolina, Marjorie K. Lynch, by and through undersigned  
counsel, and pursuant to Local Rule of Appellate Procedure 31(c) respectfully  
moves for an order extending the deadline for filing her opening brief and  
appendix from May 10, 2016 until May 24, 2016, and the deadline for the  
appellees to file their reply brief from June 13, 2016 to June 27, 2016, for the  
following reasons:

1. On March 28, 2016, lead counsel for the appellant was injured in an automobile accident. As a result of the automobile accident, lead counsel sustained injuries that necessitated medical leave until April 18, 2016.

2. On March 31, 2016, this Court entered the Briefing Order which set a deadline of May 10, 2016 for the Appellant's Opening Brief.

3. While the appellant has endeavored to meet the initial briefing deadline set by this Court, the absence of lead counsel due to the unforeseen circumstances described above has made meeting this deadline an extreme burden.

4. Counsel for the Appellees has consented to this request and the following extended briefing deadlines:

a. Appellant's Opening Brief and Appendix: May 24, 2016;

b. Appellees' Response Brief: June 27, 2016.

WHEREFORE, the Appellant respectfully requests that this Court enter an order extending the time in which the Appellant may file her Opening Brief and Appendix to May 24, 2016, and the time in which the Appellees may file their Response Brief to June 27, 2016. A proposed order is attached.

Respectfully submitted, this the 29th day of April, 2016.

By: /s/ Brian C. Behr

Brian C. Behr

Staff Attorney

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*Attorney for the Appellant*  
*Bankruptcy Administrator*

### CERTIFICATE OF SERVICE

I certify that on April 29, 2016, the foregoing document was served on all parties through their counsel of record through the CM/ECF system.

By: /s/ Brian C. Behr  
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ORDER

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Upon consideration of the Appellant's Consent Motion for Extension of  
Briefing Deadlines, it is, this \_\_\_\_ day of May, 2016, ORDERED:

(1) that the motion be GRANTED;

(2) that the deadline for filing the appellant's opening brief and appendix is  
extended to May 24, 2016; and

(3) that the deadline for filing the appellees' response brief is extended to June 24,  
2016.